

DONELL FREEMAN  
*Plaintiff*

v.

KABEERUDDIN HASHMI, MD; KEVIN MCDONNELL, MD; DR. JOHN DOE, MD; MONMOUTH COUNTY CORRECTIONAL INSTITUTION, DONALD SUTTON; JOHN DOES A-E, CORRECT CARE SOLUTIONS LLC d/b/a WELLPATH, SCOTT MILLER, MD, ST. FRANCIS MEDICAL CENTER, ZIMMER BIOMET HOLDINGS, COUNTY OF MONMOUTH, DEPARTMENT OF CORRECTIONS, STATE OF NEW JERSEY, STATE OF NEW JERSEY

*Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**TRENTON VICINAGE**

Docket No.: 3:18-cv-7802

**CASE MANAGEMENT ORDER**

This matter having come before the Court by way of a Case Management Conference on Monday, October 7, 2019, Dominic A. DeLaurentis, III, Esquire of Stahl & DeLaurentis, P.C., being present on behalf of defendant St Francis Medical Center and the Court having considered the request of all parties, and no good cause being shown to the contrary;

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2019, ORDERED and ADJUDGED that pursuant to agreement of the parties at the October 7, 2019 Case Management Conference the following deadlines are hereby established:

1. The following deadlines are to be followed regardless of the status of any pending Motion.
2. Plaintiff's counsel is to serve St. Francis Medical Center with written discovery requests regarding the hip replacement product information as well as the related medical record release authorizations by October 15, 2019.

3. St. Francis Medical Center is to respond to plaintiff's written discovery request regarding the hip replacement product information by November 30, 2019.
4. Parties are to serve all written discovery by January 1, 2020.
5. Parties are to serve responses to all written discovery by March 1, 2020.
6. A status conference call will be conducted in March of 2020 at a date and time decided by the Court.
7. Any disputes regarding written discovery are to be raised prior to April 15, 2020.
8. All other discovery deadlines shall be established pending the outcome of Motion practice.

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Zahid N. Quraishi, USMJDNJ